

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE: Ivan Aldahondo Serrano, Ivette Amarilis Vera Feliciano Debtors	CASE NO. 05-10544 (MCF) CHAPTER 13
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MOTION TO WITHDRAW UNCLAIMED FUNDS

TO THE HONORABLE COURT:

COME NOW, Jairo Camargo, Attorney in Fact for Ivan Aldahondo Serrano and Ivette Amarilis Vera Feliciano (*hereinafter the "claimants"*), represented by their undersigned attorney and to this Honorable Court very most respectfully state and pray:

1. The herein appearing parties were claimants in the above referenced case. As per Local Rule 3011-1(b)(2)(A), claimants include a copy of their driver's license and their social security numbers are ###-##-1926 and ###-##-5548 respectively.

2. The Bankruptcy Court currently holds **\$3,750.00** in registry of the Clerk of the Bankruptcy Court as unclaimed funds, which were destined for the claimants.

3. The claimants have appointed **Mr. Jairo Camargo** as their Attorney in Fact to seek the recovery of said unclaimed funds on its behalf and authorized the Court to issue the payment of any uncollected funds in the

present case to be issued in favor of the claimant and Mr. Jairo Camargo. As required by Local Rule 3011-1(b)(2)(D), copy of the Limited Power of Attorney is attached to this Motion.

4. The appearing party herein respectfully requests that the Court issue an Order for the Clerk of the Bankruptcy Court to pay the unclaimed funds in the amount of **\$3,750.00** held in favor of claimants, payable to **Ivan Aldahondo Serrano and Ivette Amarilis Vera Feliciano and Jairo Camargo**, and send said payment to Atty. Rafael A. Gonzalez Valiente at P.O. Box 9022512, San Juan P.R. 00902-2512.

WHEREFORE, it is hereby respectfully requested from this Honorable Court to take note of the above and issue an Order for the Clerk of the Bankruptcy Court to pay said unclaimed funds in the amount of **\$3,750.00** held in favor of claimants, payable to **Ivan Aldahondo Serrano, Ivette Amarilis Vera Feliciano and Jairo Camargo** and to send said payment to Atty. Rafael A. González Valiente at P.O. Box 9022512, San Juan P.R. 00902-2512.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 14th day of June of 2013.

NOTICE TO ALL CREDITORS AND PARTIES IN INTEREST

Within fourteen (14) days after service as evidenced by the certification – and an additional three (3) days pursuant to Fed. R. Bankr. P. 9006(f) if you were served by mail – any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, must serve and file an objection or other appropriate response to this paper with the Clerk's Office of the U.S. Bankruptcy Court for the District of

Puerto Rico. If no objection or other response is timely filed within the time allowed herein, the paper will be deemed unopposed, unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the Court, the interest of justice otherwise requires.

CERTIFICATE OF SERVICE I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the **Assistant US Trustee**, and all participants of CM/ECF. In addition a copy of this Motion is being sent to the U.S. Attorney at Torre Chardon, Oficina 1201, 350 Ave. Carlos Chardon, San Juan, PR 00918; Assistant U.S. Trustee at Office of the US Trustee, 500 Tanca St., Suite 301, San Juan, PR 00901; Jose Carrion (Chapter 13 Trustee) at PO Box 9023884, San Juan, PR 00902-3884; Ivan Aldahondo Serrano and Ivette Amarilis Vera Feliciano c/o Jairo Camargo, P.O. Box 546293, Miami Beach, FL 33154; and Gloria Justiniano Irizarry at A Ramirez Silva 53, Mayaguez, PR 00680.

/s/ Rafael A. González Valiente

USDC NO. 225209

Látimer, Biaggi, Rachid & Godreau

PO BOX 9022512

SAN JUAN, PR 00902-2512

☎TEL. (787)724-0230 / 📠FAX (787) 724-9171

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conductor ☒ operator

IVETTE A VERA FELICIANO

BO ALTOZANO 5'02"
SAN SEBASTIAN PR 00685 140 lbs
Nacim/Birth 03feb1952 bro

Lic 1300368
Exp 03feb2014
Restr 07000

5355/0007152873
192/20080226/03

ESTADO LIBRE DE Puerto Rico Licencia de Conducir
Driver's License

veh pesado III ☒ heavy veh III

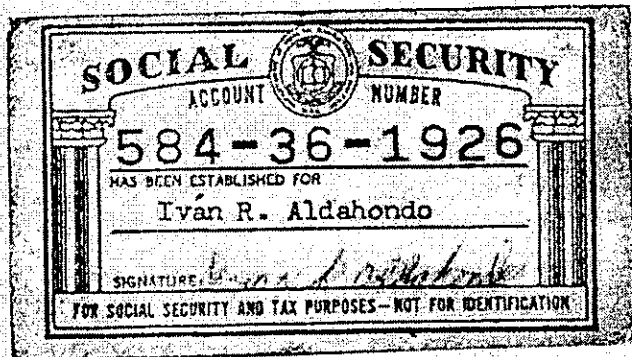
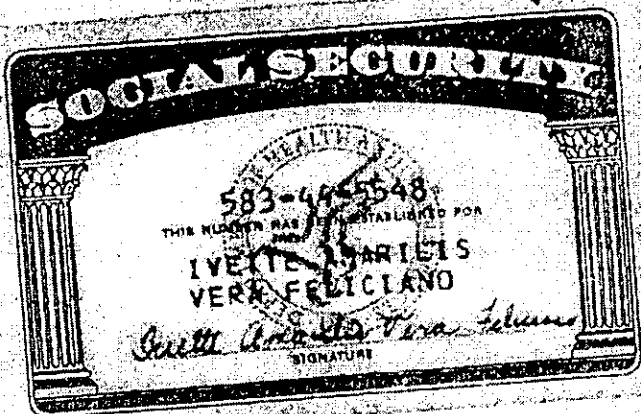
IVAN R ALDAHONDO SERRANO

BO SONADOR M 5'
CARR 109 KM 25.8 09"
SAN SEBASTIAN PR 00685 190 lbs
Nacim/Birth 20nov1990 bro

Lic 0563077
Exp 20nov2012

5310/0006749963
192/20070807/03

ESTADO LIBRE DE Puerto Rico Licencia de Conducir
Driver's License



LIMITED POWER OF ATTORNEY
(For one transaction only)

I, (we) Ivan Aldahondo Serrano & Ivette A. Vera Feliciano, do hereby grant to Jairo A. Camargo, my (our) sole true and lawful attorney-in-fact for me (us) and my (our) name, place and stead, giving unto my (our) attorney-in-fact full power to do and perform, on an exclusive basis, all and every act not constituting the practice of law that I (we) may legally do through an attorney-in-fact, for the following **limited purpose only and for no other:**

To reclaim, recover, and return unclaimed funds in the amount of \$3,750.00.

This Limited Power of Attorney is specifically limited to the collection and disbursement of the above named funds and not valid for any other purpose. It shall expire upon completion of this collection. I (we) authorize the use of a photocopy of this Power of Attorney, in lieu of the original.

I (we) do hereby certify that the foregoing is true and correct.


Signature: Ivan Aldahondo Serrano


Signature: Ivette A. Vera Feliciano

NOTARY ACKNOWLEDGMENT

State of Puerto Rico

Affidavit # -9,788-

SUBSCRIBED AND SWORN on the 12th day of January, 2012 before me, personally appeared Ivan Aldahondo Serrano & Ivette A. Vera Feliciano, personally known to me or proved to me on the basis of satisfactory evidence (see identification below) to be the persons whose name is subscribed to within instrument and acknowledgment to me, that they executed the same in their authorized capacity, and that by their signature on the instrument the person or their entity upon behalf of which the person acted executed the instrument.

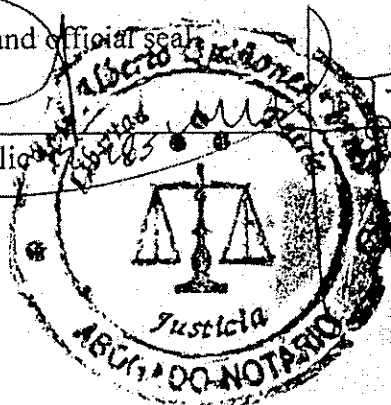
Identification for the above named was Drivers License (or other identification): personally known

WITNESS my hand and official seal

Signature

Notary Public

commission expires: does not expire



UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE: Ivan Aldahondo Serrano, Ivette Amarilis Vera Feliciano Debtor	CASE NO. 05-10544 (MCF) CHAPTER 13
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ORDER FOR PAYMENT OF UNCLAIMED FUNDS

Upon Motion to Withdraw Unclaimed Funds, filed by Mr. Jairo A. Camargo on behalf of Ivan Aldahondo Serrano and Ivette Amarilis Vera Feliciano (claimants or successors in interest to original claimant) and in accordance with the provisions of 28 U.S.C. §2042, it is

ORDERED that, following review by the Clerk of the Motion to Withdraw Unclaimed Funds and Power of Attorney, the Clerk is directed to remit to **Jairo Camargo**, the "Funds Locator/Attorney in Fact" retained by the claimants **Ivan Aldahondo Serrano and Ivette Amarilis Vera Feliciano** the sum of **\$3,750.00**, now held as unclaimed funds in the treasury for the original claimants **Ivan Aldahondo Serrano and Ivette Amarilis Vera Feliciano**.

Where claimant has retained a "Funds Locator/Attorney in Fact", the check for these funds shall be issued in the name of the claimants and Jairo Camargo and shall be mailed to Atty. Rafael A. González Valiente at P.O. Box 9022512, San Juan P.R. 00902-2512.

ORDERED in San Juan Puerto Rico on _____.

U.S. Bankruptcy Judge